



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AH/RMT/MEG
F.#2013R00312

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 18, 2014

By Hand and ECF

Frederick L. Sosinsky, Esq.
45 Broadway, 30th Floor
New York, NY 10006

Re: United States v. Mohammad Ajmal Choudhry
Criminal Docket No. 13-150 (S-2)(WFK)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

Please find the following materials saved on the enclosed three compact discs. With the exception of exhibits 42 and 47, the government currently does not intend to introduce any of these enclosed records into evidence at trial during its case-in-chief. We will advise immediately if that fact changes.

Ex	Description
42	Maps provided by the NYC Taxi and Limousine Commission pertaining to records produced to the defense on October 1, 2013
43	Subscriber information pertaining to certain telephone numbers
44	Subscriber and call records pertaining to certain calling cards

Ex	Description
45	Certain records provided by Payomatic
46	Certain phone records ¹
47	Reports containing data recovered from certain cellular phones
48	Reports containing data recovered from certain cellular phones
49	Reports containing data recovered from certain cellular phones

The government also is in possession of two SIM cards and a cellular phone that were used and possessed by Amina Ajmal in Pakistan. The government has been unable to recover any data from those devices, but they are available for your review upon request.

In addition, as described in prior discovery disclosures, the government is in possession of certain physical evidence, including a computer, seized pursuant to judicially authorized search warrants that have previously been produced to you. This physical evidence remains available for your examination and review upon request.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Amanda Hector
Richard M. Tucker
Margaret E. Gandy
Assistant U.S. Attorneys
(718) 254- 6212/6204/6213

Enclosures

cc: Clerk of Court (WFK) (w/o enclosure)

¹ These records were obtained from Pakistan and are purportedly call details records for Nisar Ahmed's cellular telephone. We have been unable to authenticate these records and therefore do not intend to introduce them into evidence at trial.